

March 1, 2000

Sent via e-mail and either hand-delivery, fax, or U.S. Mail

Mary L. Cottrell, Secretary

Massachusetts Department of Telecommunications and Energy

One South Station, 2nd Floor

Boston, MA 02110

Re: Bell Atlantic's Local Service Provider Freeze, D.T.E. 99-105

Dear Secretary Cottrell:

Enclosed for filing in the above-referenced matter please find the Attorney General's First Set of Information Requests for Bell Atlantic.

If you have any questions please do not hesitate to call.

Sincerely,

Karlen J. Reed

Assistant Attorney General

Regulated Industries Division

200 Portland Street, 4th Floor

Boston, MA 02114

617-727-2200

KJR/kr

Enc.

cc: Paula Foley, Hearing Officer (w/enc.)

D.T.E. 99-105 Service List (w/enc.)

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Investigation by the Department of Telecommunications)

and Energy, on its own motion, as to the propriety of the)

Local Service Provider Freeze terms and conditions set) D.T.E. 99-105

forth in the following tariff: M.D.T.E. No. 10, Part A,)

Section 5, Original of Page 1.1, filed with the Department)

on November 1, 1999 by New England Telephone and)

Telegraph Company d/b/a Bell Atlantic-Massachusetts.)

_____)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the enclosed service list by e-mail and either hand-delivery, fax, or mail.

Dated at Boston this 1st day of March 2000.

Karlen J. Reed

Assistant Attorney General

Regulated Industries Division

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Boston, MA 02114

(617) 727-2200

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**THE ATTORNEY GENERAL'S
INSTRUCTIONS FOR RESPONDING TO
INFORMATION REQUESTS**

1. These Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to New England Telephone and Telegraph Company d/b/a Bell Atlantic-Massachusetts ("Bell Atlantic" or "the Company") or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.

2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.

3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.

4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.

5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.

6. Each Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.

7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.

8. If an Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the

other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.

9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.

10. If, in answering any of these Information Requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.

11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.

12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.

14. Each request for information includes a request for all documentation which supports the response provided.

15. Please provide one copy of each response.

16. The term "Company" refers to the Company that the data and information requests are directed to. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, agents, and legal counsel.

17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

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**THE ATTORNEY GENERAL'S
FIRST SET OF INFORMATION REQUESTS**

FOR BELL ATLANTIC

AG-BA-1-1 Please provide the total number of Local Service Provider Freeze ("LSPF") requests that Bell Atlantic has received in Massachusetts since January 1, 1999.

AG-BA-1-2 Please provide the total number of LSPF requests that Bell Atlantic has implemented in Massachusetts since January 1, 1999.

AG-BA-1-3 Please provide the number of complaints or concerns claiming an unauthorized switching of local, toll and/or long distance carriers that Bell Atlantic has received in Massachusetts in the years 1998, 1999, and since January 1, 2000. As part of this answer, please separate but mask the identity of the carriers referenced in the complaints using the following format:

| Year / Type | Carrier 1 | Carrier 2 | Carrier 3 | Carrier 4 | Carrier 5 | Total |
|----------------------|-----------|-----------|-----------|-----------|-----------|-------|
| 1998 - local | | | | | | |
| 1998 - toll | | | | | | |
| 1998 - long distance | | | | | | |
| 1998 - Total | | | | | | |
| 1999 - local | | | | | | |
| 1999 - toll | | | | | | |
| 1999 - long distance | | | | | | |
| 1999 - Total | | | | | | |
| 2000 - local | | | | | | |
| 2000 - toll | | | | | | |
| 2000 - long distance | | | | | | |
| 2000 - Total | | | | | | |

AG-BA-1-4 Bell Atlantic stated during the February 8, 2000, public hearing and in the prefiled testimony of Harold E. West, III, that it intends to provide its customers with the ability of its customers to lift the LSPF as they do for intraLATA and long distance PIC freezes using a secure web site. Bell Atlantic also stated during that hearing that it is inappropriate to include language reflecting this ability in Tariff No. 10. Please explain how Bell Atlantic's decision not to include the secure web site information in Tariff No. 10 complies with the Department's final order of May 21, 1999, as modified on reconsideration on October 19, 1999, in DTE. 98-59, Tel-Save, Inc., which requires Bell Atlantic to include the secure web site information on local service freezes in its tariff.

AG-BA-1-5 Does Bell Atlantic intend to distribute bill inserts to its customers advising them of the availability of using its secure web site to lift the LSPF?

March 1, 2000

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SERVICE LIST

Update 3/1/2000

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